

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Cequent Performance Products, Inc.,)	Case No. 1:13-cv-209-JG
)	
Plaintiff,)	Judge James Gwin
)	
vs.)	
)	
Pacific Rim International, LLC,)	
)	
Defendant.)	

**Cequent's Motion for 30-Day Extension to Respond to
Pacific Rim's Interrogatories and Requests for Production**

In accordance with Rule 6 of the Federal Rules of Civil Procedure, Cequent Performance Products, Inc. moves for a 30-day extension of time, until June 10, 2013, to serve Pacific Rim International, LLC, with Cequent's answers to interrogatories, written responses to Pacific Rim's requests for production, and objections. There is good cause for this request because Cequent's personnel need additional time to compile the requested information needed to respond. And Pacific Rim's attorney would only agree to a 4-business-day extension, thus necessitating this motion.¹

On April 10, 2013, Pacific Rim served 45 broad and extensive requests for production and 14 interrogatories. Despite its diligence, Cequent is unable to serve complete responses and objections to these 59 requests within the 30 days that Pacific Rim demands. Properly responding involves several significant steps. First,

¹ In contrast, Pacific Rim previously asked Cequent to reschedule the upcoming May 21 case management conference, and Cequent agreed as a courtesy even though Cequent's representative would forfeit the airline tickets that he had purchased to attend. Pacific Rim's schedule now allows for it to attend on the original May 21 date.

Cequent's attorneys must read and understand what is being requested, which is no easy task since the requests include pages of overly complicated "DEFINITIONS." As an example, Pacific Rim's definition of the simple word "Document" is over a page long. Cequent then must search its paper and electronic files for the relevant documents requested. This is a lengthy step because it requires Cequent to search computer servers and hard drives, and because Pacific Rim has requested a broad range of documents, including sales, financial records, and engineering drawings for nine different products. Counsel must then review what Cequent produces, follow up with Cequent for additional documents or information, review the gathered documents for privilege and relevance, work with Cequent to draft answers to the interrogatories, draft objections, and draft written responses to the requests for production. Cequent needs an additional 30 days to complete this process.

Cequent is not requesting this extension for delay or for any other improper purpose, but rather because it has a genuine need for more time. As this case has just begun, Pacific Rim will suffer no prejudice if this request is granted. Despite Pacific Rim defaulting to start this case, the case is now moving at a strong pace as both sides served written discovery requests almost immediately, and well before the Rule 26(f) conference as the Court ordered them to do. (Apr. 9, 2013, Schedule Order, ECF # 15.)

For the foregoing reasons, the Court should grant Cequent until June 10, 2013, to serve its objections, answers to Pacific Rim's interrogatories, and written responses to its requests for production.

Respectfully submitted,

Dated: May 10, 2013

s/ Matthew J. Cavanagh

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Certificate of Service

I hereby certify that on May 10, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's system.

s/ Matthew J. Cavanagh
Counsel for
Cequent Performance Products, Inc.